

UNITED STATES BANKRUPTCY
WESTERN DISTRICT OF NEW YORK
IN RE:

LEAST, GARY L.
Ind. and as Officer of LEAST FORD, INC.,
LEAST CHRYSLER PLYMOUTH DODGE, INC.,
LEAST CHEVROLET, INC.
MIDWEST FLEET SERVICE, INC.,

Bk. No. 03-20447
Chapter 7

Debtor(s).

**COMPLAINT TO AVOID
JUDGMENTS AS PREFERENCES
UNDER 11 USC 547**

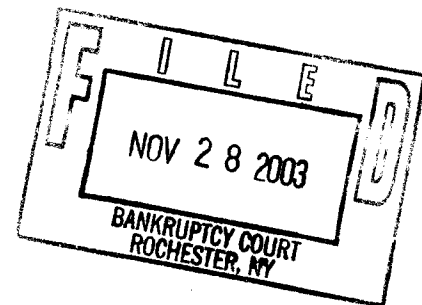
KENNETH W. GORDON, AS TRUSTEE,

Plaintiff,

AP No:

vs.

KEITH CAVALIER, WAYNE PRICE, JODY
RICHARDSON, MARTIN FLICKNER,
KAREN WELLMAN, MICHAEL WATSON,
ERIC SAWYER, PATRICK ARGENTIERI,
SANDRA ARGENTIERI, WILLIAM TAPP,
JANET BRAUN, JUSTIN BRAUN, NANCY
COVERT, JANET CONKLIN, ANICE CRAGG,
JOSEPH D'AGOSTINO, DAVID DAY, JOSEPH
BRAISINGTON, LAYLA SMALLS PARKER,
TERRY SCHOFIELD-MEHLENBACHER,
TIMOTHY FERRARA, JR., JEFFREY FAULKNER,
JOHN DRISCOLL, GAIL DORR, JENNIFER
DIPASQUALE, DENISE BINDER, CHARLES
DIPASQUALE, JR., GARY TUTTLE, MARIS
HASKINS CARSON, PATRICIA DEGRAFF, DENNIS
DAWSON, MARK LUBANSKI, JENNIFER
LUBANSKI, JAMES CLARK, RICHARD WILKINS,
JESSICA WILKINS, DAVID DIPASQUALE, BRIAN
WOOD, ROBERT SQUIRES, JR., SHARON DECKER,
JEAN TUTTLE, SHARI PASCUZZO, TIMOTHY LANA,
NEAL LACOMBE, TIMOTHY KELLEY, DONNA
FLICKNER, JONATHON HARCELROAD, MICHAEL
LECESSE, CHARLES GALLETTI, VICTOR VAN VLIET,
KIM QUINLAN, DANIEL SCOVILLE, GVE, INC.,
RONNIE LEE LOOP, RAYLENE LANGENFIELD,



DOUGLAS HUNN, SCOTT KELLY, DEBRA BARROW,
ROLAND FLICKNER, STEPHEN HAWKINS, JOSEPH
HUETTE, NORBERT JOHNSON, JOAN DEMMER,
NICOLE SWEENEY, TONYA SCHROEDER, BRIAN
SCHIRMER, JOHN T. HARCELROAD, SR., JOHN
WALLIN, HEATHER MYERS, HEIDI PARROTT,
CARL PATTERSON, DEBBIE PIERSON, NEIL
PRICE, JR., GERALD RENSHAW, ANDREA
LAMINITINA,

Defendants.

Plaintiff, by his attorney, Kenneth W. Gordon, Esq., for his complaint against defendants alleges as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 USC sections 157 and 1334. This matter is a core proceeding pursuant to 28 USC section 157.
2. On February 12, 2003, the debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code in this Court, and an Order for relief was subsequently entered herein.
3. Plaintiff, Kenneth W. Gordon, is the duly qualified and acting Trustee in this case.

FIRST CAUSE OF ACTION

4. This cause of action is brought pursuant to 11 U.S.C. §547(b) to avoid the judgments filed against the debtor in the Livingston County Clerk's Office on November 20, 2002 in favor of the above named defendants.
5. This case has neither been closed nor dismissed at the time of the filing of this Complaint, nor has two years elapsed since the entry of the order for relief.
6. At the time the judgments were filed, debtor had one or more creditors holding unsecured claims that are allowable under 11 USC section 502, and which claims arose prior to the filing of the judgments.

7. The judgments arose from the allegations involving transactions by debtor which occurred prior to when the judgments were filed.

8. The judgment of each of the above-named defendants was filed within 90 days before the date of filing of debtor's petition and at a time when debtor was insolvent.

9. The said judgments of the defendants would enable the defendants to receive more than they would have received under Chapter 7, if the judgments had not been filed and if the defendants were to receive a pro rata distribution pursuant to the Code.

10. The assets which have come into the hands of plaintiff, as Trustee in Bankruptcy, are insufficient to fully pay those who hold allowable claims against the debtor.

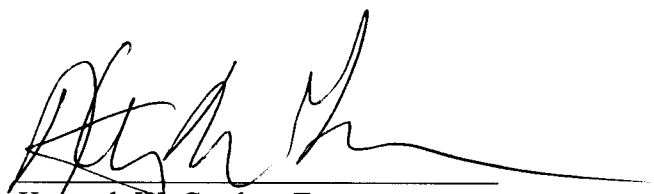
11. Plaintiff has no other adequate remedy at law.

WHEREFORE, plaintiff respectfully requests judgment against defendants as follows:

- (a) That each and every judgment of the named defendants filed on November 20, 2002 be declared void and set aside and ;
- (b) Plaintiff be awarded such other and further relief as to the Court may seem just and proper.

Dated: 11/26/03

BY:



Kenneth W. Gordon, Esq.
Attorney for Plaintiff - Chapter 7 Trustee
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